

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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Mary Richardson  
4757 Chuck Ave  
Memphis, Tenn 38118  
(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. \_\_\_\_\_

The Village at Germantown  
7820 Walking Horse Circle  
Germantown, Tenn 38138  
(Name of defendant or defendants)

**COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964**

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Mary Richardson  
(name of plaintiff)

is a citizen of the United States and resides at 4757 Chuck Ave  
(street address)

Memphis, Shelby Tenn  
(city) (country) (state)

38118 901-562-5921  
(zip code) (telephone number)

3. Defendant The Village at Germantown  
(defendant's name)

lives at, or its business is located at 7820 Walking Horse Circle  
(street address)  
Germantown, Tenn, 38138

4. Plaintiff sought employment from the defendant or was employed by the defendant at

7820 Walking Horse Circle  
(street address)  
Germantown Shelby Tenn 38138  
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 15 September 2011  
(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 12 April 2012  
(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 12 April 2012  
(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 29 April 2013. (Attach a copy of the notice to this complaint.)  
(day) (month) (year)

9. Because of plaintiff's (1) X race, (2) \_\_\_ color, (3) \_\_\_ sex, (4) \_\_\_ religion, (5) \_\_\_ national origin, defendant

(a) \_\_\_ failed to employ plaintiff.

(b) X terminated plaintiff's employment.

(c) X failed to promote plaintiff.

(d) \_\_\_\_\_

10. The circumstances under which defendant discriminated against plaintiff were as follows: I am an (African American) female, and I was hired on or around April 12, 2010 in the position of Dietary Server. I File a charge of discrimination on April 12, 2012. EEOC #490-2012-01402 based upon my belief that I was discriminated against based upon my age and race in connection with a promotional position for an open Server. I applied but was denied selection. I was terminated on Feb 10, 2013 after I filed a prior charge of discrimination. I believe that I have been discriminated against in violation of Title VII of the Civil Rights Act of 1964, as Amend.

11. The acts set forth in paragraph 9 of this complaint

- (a) ☒ are still being committed by defendant.  
 (b) ☐ are no longer being committed by defendant.  
 (c) ☐ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) ☐ Defendant be directed to employ plaintiff, or  
 (b) ☒ Defendant be directed to re-employ plaintiff, or  
 (c) ☒ Defendant be directed to promote plaintiff, or;  
 (d) ☐ Defendant be directed to \_\_\_\_\_

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes ☒ No ☐

Mary Richardson  
 SIGNATURE OF PLAINTIFF